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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 SAN FRANCISCO DIVISION

20 AUDLEY BARRINGTON LYON, JR., et. al., Case No.: 13-cv-05878 EMC

21 Plaintiffs,

22 v.

23 UNITED STATES IMMIGRATION AND
24 CUSTOMS ENFORCEMENT, et. al.,

25 Defendants.

**JOINT STIPULATION REGARDING
REDACTION OF WITNESS NAMES
EXCEPT INITIALS; [PROPOSED]
ORDER**

[PURSUANT TO CIVIL L.R. 7-12]

26 CLASS ACTION

The Parties to this action hereby agree to the following regarding the redaction of the names of certain declarants in this litigation as permitted by the Federal Rules of Civil Procedure Rule 5.2(e). WHEREAS:

Many Plaintiff class members are seeking or have sought relief from removal based on fear of persecution and in their home countries or based on other grounds that could subject them to retaliation here or abroad;

Plaintiff class members seeking such relief may have statutory privacy rights to protect them from harm. *See e.g.* 8 C.F.R. §§ 208.6, 1208.6 (regulations protecting an asylum-seeker's right to confidentiality);

Plaintiff class members seek to submit declarations in support of Plaintiffs' motion for summary judgment, some of which include references to statutorily protected claims for relief or sensitive facts that create concern regarding harassment and retaliation; and

The Parties agree that protecting Plaintiff class members from potential harm related to disclosure of their identities and the subject matter of their immigration cases can be achieved without prejudice to Defendants by substituting initials for class member witnesses' full names in the parties' briefs and evidentiary submissions.

NOW THEREFORE, the Parties stipulate that:

1. Papers and evidence filed in the public record will be redacted to reveal only initials of Plaintiff class member witnesses who are not named representatives;

2. The names of class representatives will not be redacted;

3. In conjunction with Plaintiffs' Motion for Summary Judgment, Plaintiffs will file under seal a reference list of the declarants' full names and corresponding initials, pursuant to Fed. R. Civ. Pro. 5.2(g); and

4. The Parties need not file unredacted versions of the papers and evidence filed in the public record in accordance with paragraph 1 under seal, serve unredacted versions of such papers or evidence upon each other, or provide such unredacted versions as courtesy copies to the Court.

1 THE PARTIES SO STIPULATE, THROUGH THEIR COUNSEL OF RECORD.

2 Dated: December 15, 2015

3 By: /s/ Julia Harumi Mass
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1 Dated: December 15, 2015

OFFICE OF IMMIGRATION LITIGATION,
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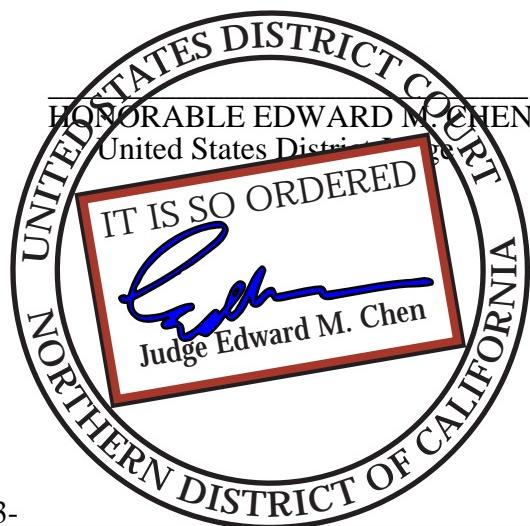
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16
17
18 [PROPOSED] ORDER
19
20 PURSUANT TO STIPULATION, IT IS SO ORDERED.
21
22 Dated: _____ December 16, 2015
23
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1 **CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES**
2
3

4 I, Julia Harumi Mass, am the ECF user whose ID and password are being used to file
5 this Joint Stipulation Regarding Redaction of Names Except for Initials and [Proposed] Order.
6 I hereby certify that each of the other signatories has concurred in the filing of this document
and has authorized the use of his/her electronic signature.

7 Dated: December 15, 2015

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9 /s/ *Julia Harumi Mass* _____
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